



**Katharine V. Jackson**

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April 22, 2008

**VIA ECF**

The Honorable Sue L. Robinson  
U.S. District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 N. King Street  
Room 6124  
Lockbox 31  
Wilmington, DE 19801

**Re: Lorah v. Tetra Tech, Inc., C.A. No. 06-00538**

Dear Judge Robinson:

I am writing on behalf of Tetra Tech, Inc., this firm's client and the defendant in the above-referenced civil action. Enclosed with this letter please find a privilege log relevant to the documents produced pursuant to Your Honor's Order of March 31, 2008 and filed with the Court on April 16, 2008.

Please do not hesitate to contact me if Your Honor has any questions or concerns.

Respectfully submitted,

*/s/ Katharine V. Jackson*

Katharine V. Jackson (Del. I.D. No. 4800)

Enclosures

cc: Sara A. Begley, Esq.  
Shannon E. McClure, Esq.  
Jordean Lorah (via US mail) (w/enclosures)

**Morgan v. George W. Hill Correctional Facility et al.****GEO Defendants' Privilege Log**

<b>Bates Range</b>	<b>Doc Type</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Subject Matter</b>	<b>Privilege Asserted</b>
	Fax confirmation sheet with handwritten notes	12/20/05			Handwritten notes re: telephone conference with G. Porter of Synerfac	Work Product
	Synerfac invoice to Tetra Tech, Inc.	6/20/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	6/20/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	6/13/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	6/13/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	6/6/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	5/23/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	5/16/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy

<b>Bates Range</b>	<b>Doc Type</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Subject Matter</b>	<b>Privilege Asserted</b>
	Synerfac invoice to Tetra Tech, Inc.	5/9/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	5/2/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	4/25/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Synerfac invoice to Tetra Tech, Inc.	4/18/05	Synerfac	John Traynor	Invoice for services	Other employee names redacted for confidentiality and privacy
	Request for Information and Request for Position Statement with handwritten notes	Undated (after November 2005)	A. Clark, Director, Human Resources, Tetra Tech, Inc. (Pasadena, CA)	N/A	Response to EEOC Request for Information and Request for Position Statement	Work Product
	Fax Cover Sheet with handwritten notes	11/29/05	S. Brewer, Manager, General Services and Administration, Tetra Tech, Inc. (Christiana, DE)	A. Clark	Information for Response to EEOC Request for Information and Request for Position Statement	Work Product
	Fax Cover Sheet with handwritten notes	12/12/05	S. Brewer	A. Clark	Information for Response to EEOC Request for Information and Request for Position Statement	Work Product
	Handwritten notes	Undated (after November 2005)	A. Clark	N/A	Handwritten notes re: EEOC charge filed by J. Lorah	Work Product

<b>Bates Range</b>	<b>Doc Type</b>	<b>Date</b>	<b>Author</b>	<b>Recipient</b>	<b>Subject Matter</b>	<b>Privilege Asserted</b>
	Email with handwritten notes	12/8/05	A. Clark	S. Brewer	EEOC Complaint filed by J. Lorah	Work Product
	Email with handwritten notes	12/12/05	S. Brewer	A. Clark	EEOC Complaint filed by J. Lorah	Work Product
	Email	12/19/05	S. Brewer	A. Clark	Email re: investigation of EEOC Complaint filed by J. Lorah	Work Product
	Handwritten notes	12/20/05	A. Clark	N/A	Handwritten notes re: telephone conference with S. Brewer and J. Traynor	Work Product
	Fax cover sheet with notes	1/25/07	S. Brewer	A. Clark	J. Lorah Complaint	Work Product
	Case with highlighting	1/25/07	S. Brewer	A. Clark	Research re: J. Lorah	Work Product
	Fax cover sheet with handwritten notes	12/12/05	S. Brewer	A. Clark	EEOC Response	Work Product
	Email with handwritten notes	12/8/05	A. Clark	S. Brewer	Information for Response to EEOC Request for Information and Request for Position Statement	Work Product

**CERTIFICATE OF SERVICE**

I, Katharine V. Jackson, Esquire hereby certify that a true and correct copy of the foregoing ***Privilege Log*** was served this 22nd day of April, 2008 via U.S. Mail to the following parties:

Jordean Lorah  
114 Walls Avenue  
Wilmington, Delaware 19805

/s/ Katharine V. Jackson  
Katharine V. Jackson (DE ID 4800)